IN THE IOWA DISTRICT COURT FOR POLK COUNTY

PLANNED PARENTHOOD OF THE HEARTLAND, INC., EMMA GOLDMAN CLINIC, and JILL MEADOWS. M.D., Petitioners, v. KIM REYNOLDS ex rel. STATE OF IOWA and IOWA BOARD OF MEDICINE, Respondents.	Equity Case No. 05771 EQCE083074 RESPONDENTS' BRIEF IN RESISTANCE TO SUMMARY JUDGMENT

Respondents Iowa Governor Kimberly K. Reynolds, ex rel. State of Iowa, and the Iowa Board of Medicine, request the Court to deny Petitioners Planned Parenthood of the Heartland and Jill Meadows' Motion for Summary Judgment on the following grounds:

- there exist a number of genuine issues of material fact; and
- the Iowa Heartbeat Bill is narrowly tailored to further the State of Iowa's compelling interest in the life of a child in the womb with a measurable heartbeat.

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I. STATEMENT OF FACTS

Petitioners make a somewhat astounding claim that "no issues of material fact exist." (Motion for Summary Judgment, ¶3.) This is an abortion case -- it would be highly unlikely opposing parties in such a case ever would be without any disputes. This case is no different. There are a great number of genuine issues of material fact in dispute in this case, and it is unlikely the Petitioners are willing to concede many of them, if any.

A. Statement of Undisputed Facts

Two matters are undisputed: the language of Senate File 359 ("the Heartbeat Bill") and the language of *Planned Parenthood of the Heartland and Jill Meadows v. Kimberly K. Reynolds, ex rel. State of Iowa and the Iowa Board of Medicine*, 915 N.W. 2d 206 (June 26, 2018).

The Heartbeat Bill amends Iowa's abortion statutes. At issue in this law suit is Section 146C.2, which provides in pertinent part:

1. Except in the case of medical emergency or when the abortion is medically necessary, a physician shall not perform an abortion unless the physician has first complied with the prerequisites of Chapter 146A and has tested the pregnant woman as specified in this subsection, to determine if a fetal heartbeat is detectable.

    a. In testing for a detectable fetal heartbeat, the physician shall perform an abdominal ultrasound, necessary to detect a fetal heartbeat according to standard medical practice….

2. a. A physician shall not perform an abortion upon a pregnant woman when it has been determined that the unborn child has a detectable fetal heartbeat, unless in the physician's reasonable medical judgment, a medical emergency exists, or when the abortion is medically necessary. …

After this act was passed by the legislature and signed into law, the Iowa Supreme Court issued a ruling declaring the unconstitutionality, under the Iowa Constitution, of the

72-hour waiting period in Iowa's previously enacted 20-week abortion bill. *Planned Parenthood of the Heartland and Jill Meadows v. Kimberly K. Reynolds, ex rel. State of Iowa and the Iowa Board of Medicine,* 915 NW2d 206 (2018) (hereinafter, "*72 Hour Ruling*").[1] That ruling has two key components:

1. For the first time, abortion was declared to be a fundamental right under the Iowa Constitution. Regulation of it is subject to strict scrutiny, which requires a compelling interest and narrow tailoring.
2. The 72-hour waiting period fails for lack of narrow tailoring.

B. <u>Statement of Disputed Facts</u>

1. Dispute Concerning Petitioners' Statement of Undisputed Facts.

Petitioners filed a Statement of Undisputed Facts, listing only three such facts. Two of them are immaterial to Petitioners' Motion for Summary Judgment. Fact No. 1 states that Petitioners provide abortions, which is not disputed. This presumably would be important as to standing, but Respondents have not challenged Petitioners' standing. Fact No. 3 deals with lack of viability of a six-week embryo, which is not disputed. However, neither viability nor a six-week embryo are material to this case, as shown below.

Petitioners listed only one other material fact in their Statement of Undisputed Facts, and it is disputed. Petitioners assert, "Embryonic or fetal cardiac activity[2] is detectable as

[1] This ruling is referred to by petitioners as *PPH II*. This is a misleading acronym, since such a designation typically is used to indicate the second case in a series, following up on the same facts and same dispute as in the first case of the series. There is no previous case involving the Iowa Heartbeat Bill. Rather, the earlier case referred to by the Petitioners was decided in 2015, also involving Planned Parenthood of the Heartland, but had no relationship whatsoever to the facts in the recent case also involving Planned Parenthood of the Heartland and some of the same parties.

[2] Planned Parenthood goes to great lengths to avoid saying the word, "heartbeat," which typically is used by medical professionals, as it is used in the affidavit of Dr. Aultman.

early as six weeks into a pregnancy, measured from the first day of the last menstrual period (lmp)."

Respondents' expert disagrees. Using the abdominal ultrasound as required by the Iowa Heartbeat Bill, the earliest at which the heartbeat of an unborn child is detectable is not until about seven to eight weeks gestation. Many children will not have a heartbeat detectable by abdominal ultrasound until nine weeks gestation, or even later. (Affidavit of Kathi Aultman, M.D.)

In addition, Respondents' expert stated that spontaneous brain function arises in the unborn child at about eight weeks gestation. This brain function has been for many years detectable via electroencephalogram (EEG). It is also indicated by coordinated movements of the child. (Affidavit of David Franco, M.D.) It is unknown whether Petitioners will concede these facts.

2. Disputed Facts Stated in the Brief in Support of Petitioners' Motion for Summary Judgment.

Petitioners make a great number of factual allegations in the first four pages of their Brief in Support of Petitioners' Motion for Summary Judgment ("Brief"). These factual statements comprise more than half of the entire Brief. Yet many, if not most, of them are disputed in this case.

Significantly, Petitioners claim the Heartbeat Bill "would prohibit virtually all abortions in the state." (Brief, 2.) The Petitioners use this as the basis for their entire argument for summary judgment. (*Id*. 6.) Yet it is in dispute. (See Part II, F, below.)

Petitioners state, "Thousands of Iowa women each year, and one in four women nationally, are faced with an unintended pregnancy, or medical complications during their

pregnancy, and decide to end that pregnancy." (*Id*. 2.) This bald claim is tellingly imprecise and prone to manipulation. It is highly unlikely each year one in four women nationally face unintended or complicated pregnancies and abort for those reasons. Yet that is what the statement says. It is disputed.

Petitioners claim the Iowa Heartbeat Bill "knowingly endangers women" and is "inhumane." (*Id*.) This cites no authority. It is disputed. To the contrary, the Heartbeat Bill would save children in the womb, some of whom are females. That is hardly inhumane. It also saves from the practice of abortion many women who later would regret that decision, as confirmed by numerous studies.

Petitioners claim, "Access to abortion is also critical to women's health … ." This is a question subject to much debate currently, nationally and locally. It also is disputed.

Strikingly, Petitioners attempt to shoehorn a great number of facts from the *72-Hour Ruling.* The Petitioners list these facts under the heading in their Brief labeled as "Background Facts." (*Id.* 4.) Petitioners then make the head-scratching assertion concerning these *72-Hour Ruling* facts that "While these findings are not material to the narrow legal issue presented here … they provide relevant context. …" (Id.) That simply makes no sense: if these facts are admittedly "not material," they could not possibly be relevant.

Nearly two full pages of the seven pages comprising the Petitioners' brief are devoted to these *72-Hour Ruling* "facts." It is obvious the Petitioners want this Court to consider these alleged "facts" in coming to a decision in the case at bar. Therefore, these facts must be undisputed, or summary judgment cannot be granted.

Yet nearly all of these "facts" extracted from the *72-Hour Ruling* would be disputed at

trial, with an extensive challenge made by the Respondents in the case at bar, due to a different factual scenario in this case and a different set of attorneys.

The facts Petitioners extracted from the *72-Hour Ruling* were subject to the limited factual presentation in that particular case. They were discussed in the *72-Hour Ruling* by certain justices of the Iowa Supreme Court in an effort to support their holding in that case. They are not to be endowed henceforth as an unchallengeable creed that must be acknowledged as established forever after.

II. ARGUMENT

A. Standard of Review

Summary judgment is only appropriate where there truly exists no genuine issue of material fact exists, and where the moving party is entitled to judgment as a matter of law. Iowa R. Civ. P. 1.981(3); *Stueckrath v. Bankers Trust Co.*, 728 N.W.2d 852 (Iowa App. 2007).

Summary judgment is a drastic remedy that must be exercised with extreme care. *Wabun-Inini v. Sessions*, 900 F.2d 1234, 1238 (8th Cir. 1990). Summary judgment should be sparingly used and is appropriate only in "those rare instances where there is no dispute of fact and where there exists only one conclusion." *Franklin v. Local 2 of the Street Metal Workers Int'l Ass'n*, 565 F.3d 508, 521 (8th Cir. 2009).[3]

In the context of a motion for summary judgment, all facts must be viewed in the light most favorable to the nonmoving party, and the nonmoving party must be given the benefit

[3] The Iowa rule is, for all practical purposes, the same as the federal rule on summary judgment. Thus, the federal cases interpreting the federal rule should be persuasive. *Sherwood v. Nissen*, 179 N.W.2d 336, 339 (Iowa 1970).

of all reasonable inferences that can be drawn from the facts. *Mason v. Vision Iowa Board*, 700 NW 2d 349, 353 (Iowa 2005); *Rifkin v. McDonald Douglas Corp*., 78 Fed 1277, 1279 -80 (8th Cir. 1996).

B. Genuine Issues of Material Fact Preclude Summary Judgment

As highlighted in the Statement of Facts above, there exist a number of disputed material facts that must be determined at trial. Perhaps the only facts not disputed are the language of the Heartbeat Bill and that the Iowa Supreme Court issued a decision in the *72-Hour Ruling*. The facts in the case before this Court, however, are not the facts in that case.

The factual disputes in this case need to be further developed by evidence. Summary judgment is not appropriate.

C. Plaintiffs Erroneously Presume *72-Hour Ruling* Controls Summary Judgment

The Petitioners' entire case is premised on the erroneous presumption that because the 72-hour waiting period before abortions was struck down in the *72-Hour Ruling*, the Heartbeat Bill, which would prohibit some abortions prior to viability, must fail as a matter of law.

The Petitioners fundamentally misunderstand the *72-Hour Ruling*. In that ruling, the Iowa Supreme Court rejected the federal undue-burden standard established in *Planned Parenthood of Southeastern Pennsylvania v. Casey,* 505 U.S. 833 (1992). Instead, the Iowa Supreme Court established a naked fundamental right to abortion under Iowa law, to be evaluated using the strict scrutiny standard. In rejecting the *Casey* undue-burden standard, the Iowa Supreme Court also rejected viability as a consideration, which had been retained

by *Casey* as part of the undue-burden standard. Thus, there is no viability standard under the new Iowa abortion law.

The traditional strict-scrutiny standard does not prohibit regulation of a fundamental right. Rather, it prohibits regulation that is poorly crafted. The standard presupposes regulation and constitutes a two-part recipe for doing it correctly: first, the state must demonstrate a compelling interest in the subject of the regulation; second, the statute must be narrowly tailored to serve that interest.

A bill imposing mere delay on abortions – such as that struck down in the *72-Hour Ruling* -- might fail for lack of narrow tailoring, while a prohibition on some of the same abortions might very well stand if it is narrowly tailored.

That is the situation presented here. The 72-hour provision in the prior statute failed due to narrow tailoring issues that do not appear in the Heartbeat Bill. The Heartbeat Bill satisfies both the compelling interest and the narrow tailoring requirements of strict scrutiny.

D. Iowa has a Compelling Interest in Preserving the Life of a Child with a Beating Heart

1. In its Recent *72-Hour* Ruling, the Iowa Supreme Court Expressly Confirmed the Compelling Nature of Iowa's Interest

In the *72-Hour Ruling*, the Iowa Supreme Court acknowledged the State's compelling interest in the unborn child: "[T]he state has a compelling interest in promoting potential life." *72-Hour Ruling,* 915 N.W. 2d at 239, citing *Roe v. Wade*, 410 U.S. at 164 and *Casey*, 505 U.S. at 871.

Iowa's compelling interest, as acknowledged by the Iowa Supreme Court, is in the

unborn child generally. It is not predicated on her having reached any particular stage of development, or even on having a heartbeat. Although in the passage above, the Iowa Supreme Court cited *Roe* v. *Wade* for its acknowledgment of a state's compelling interest and right to regulate on behalf of the child after viability, the Iowa Supreme Court did not adopt viability as a threshold for the state's compelling interest or for any other purpose. The Iowa court also cited *Casey* in the passage above for its recognition of the state's interest in "protection of potential life" and referred to it elsewhere for the proposition that the state's compelling interest arises prior to viability: "Under the undue burden standard, the state may enact previability abortion restrictions in furtherance of its interest in promoting potential life. *72-Hour Ruling,* 915 N.W. 2d at 238.

2. Iowa's Compelling Interest in the Life of the Child *in Utero* is Reinforced by Iowa Statutes Specifically Protecting Her Throughout the Pregnancy.

Iowa long has asserted it compelling interest in the child in the womb, even before the time of the heartbeat. Some of these statutes are listed below.

a. Iowa Life Sustaining Procedures Act

Iowa's Life Sustaining Procedures Act addresses the right of an individual to formally declare ahead of time his or her wishes with respect to end-of-life medical care and particularly the withdrawal of life support. However, withdrawal of life support may not be permitted if the person is known to be pregnant: "The declaration of a qualified patient known to the attending physician to be pregnant shall not be in effect as long as the fetus could develop to the point of live birth with continued application of life-sustaining procedures." Iowa Code §144A.6(2); *see also*, Iowa Code §144A.7(3) (same).

The state's interest here in protecting the unborn child is not limited to any particular stage of development.

b. Iowa's Uniform Anatomical Gift Act

The Anatomical Gift Act incorporates the definition of "person" as an "individual." Under Section 4.1, it provides that when a body or part of it may be obtained from an individual, such an "individual" includes a stillborn infant, and that a part obtained from such an individual is the tissue of a human being: " '*Decedent'* means a deceased individual whose body or part is or may be the source of an anatomical gift and includes a stillborn infant." Iowa Code § 142C.2(4).

c. Iowa's Nonconsensual Termination Act and Partial-Birth Abortion Act

It is a criminal violation in Iowa to cause serious injury to a child *in utero*, in various listed scenarios, including felonies, at any time during the pregnancy. Iowa Code §§707.8, parts 4,6,8-11 and 707.8A.

d. Other Criminal Statutes

Iowa has asserted its compelling interest to protect the child in the womb in numerous other statutes as well: *see, e.g.*, Iowa Code §§ 146B.2 (prohibiting most abortions after twenty weeks' gestation); 217.41B (prohibiting the distribution of family planning services program funds to abortion providers); 707.7 (criminalizing feticide); 707.9 (criminalizing the intentional killing of a "viable fetus aborted alive"); 707.10 (criminalizing the failure to exercise "professional skill, care, and diligence . . . to preserve the life and health of a viable fetus" born after abortion).

3. Iowa's Compelling Interest in the Life of the Child in the Womb has Been Protected by Iowa Courts Consistently and Uniformly Throughout the Entire History of Iowa's Jurisprudence

Prior to the U.S. Supreme Court's decision in *Roe v. Wade*, 410 U.S. 113 (1973), abortion was consistently prohibited in Iowa. In 1839—while Iowa was still a territory—it enacted its first abortion statute, prohibiting all abortions, no matter the reason. An Act Defining Crimes and Punishments, Jan. 25, 1839, §18, reprinted in Iowa (Terr.) Laws 153-54 (1838-39). After statehood, in 1858, the Iowa Legislature enacted a new statute making abortion a crime at any stage of pregnancy. Act of March 15, 1858, codified at Iowa Revised Laws, §4221 (1860).

This prohibition against abortion remained in the Iowa statutes, consistent with the Iowa Constitution, for nearly 120 years. Recodified at Iowa Code § 3864 (1873); recodified at McClain's Iowa Code Ann., § 5163 (1888); recodified at Iowa Code Ann. § 4759 (1897); amended by Iowa Acts 1915, ch. 45, § 1; recodified at Iowa Code Supplemental Supplement § 4759 (1915); recodified at Iowa Code § 12973 (1924); recodified at Iowa Code § 701.1 (1950); *see* Paul B. Linton, ABORTION UNDER STATE CONSTITUTIONS, A STATE-BY-STATE ANALYSIS 193-203 (2d ed. 2012). Iowa's prohibition against abortion was finally struck down, but only on federal grounds, following the United States Supreme Court's ruling in *Roe v. Wade*, 410 U.S. 113 (1973), and was repealed in 1976 Iowa Acts 549, 774, ch. 1245, § 526.

Prior to *Roe v. Wade*, abortion was so plainly contrary to Iowa's history, legal traditions, and practices that the Iowa Supreme Court regularly affirmed convictions for performing abortions. *See, e.g.*, *State v. Stafford*, 123 N.W. 167 (Iowa 1909); *State v. Barrett*, 198 N.W. 36 (Iowa 1924); *State v. Rowley*, 198 N.W. 37 (Iowa 1924); *see also*

State v. Moore, 25 Iowa 128 (1868) (second-degree murder convictions affirmed for causing death of pregnant woman by illegal abortion); *State v. Thurman*, 24 N.W. 511 (1885) (same). In fact, less than three years before *Roe v. Wade* was decided, the Iowa Supreme Court rejected vagueness and equal protection challenges to the principal Iowa abortion statute. *See State v. Abodeely*, 179 N.W.2d 347, 354-55 (Iowa 1970), *appeal dismissed, cert. denied*, 402 U.S. 936 (1971).

E. The Heartbeat Bill is Narrowly Tailored to Protect Iowa's Compelling Interest in the Life of the Child.

Having acknowledged the compelling interest in all unborn children, the Iowa Supreme Court in the *72-Hour Ruling* directed its attention to what it considered the real issue in the case, narrow tailoring: "However, in giving the state its due recognition that its interests are compelling, we must also hold the state to its convictions under the constitution. A regulation must further the identified state interest that motivated the regulation not merely in theory, but in fact." *72-Hour Ruling,* 915 N.W. 2d at 239-40.

1. Narrow Tailoring Addressed in the *72-Hour Ruling*

In rejecting the federal undue burden standard in favor of strict scrutiny, the *72-Hour* court stated:

> Narrow tailoring, conversely, replaces a *judge's subjective understandings* as to what obstacles women can conceivably withstand in pursuit of exercising a fundamental right with a *well-established framework that measures* the relationship between the government's objective and its chosen means. Narrow tailoring, while undoubtedly constraining the government's capacity to act in furtherance of its compelling interests, ensures all state forays into constitutionally protected spheres are judiciously fashioned and commit no greater intrusion than necessary.

72-Hour Ruling, 915 N.W. 2d at 240 (emphasis added).

The court recognized the rationale for narrow tailoring: the state cannot impose more

broadly upon a fundamental right than what is necessary to serve its compelling interest. The court did not prohibit restrictions on abortion. It struck down one restriction that was not narrowly tailored. In doing so, it created a framework in which more significant restrictions might stand, so long as they are narrowly tailored.

2. The Heartbeat Bill is Narrowly Tailored to a Measurable Heartbeat.

The Heartbeat statute before this Court follows the rule stated in the *72-Hour Ruling.* It asserts the state's compelling interest in a child only at the point when it has a measurable, independent heartbeat. Thus, it avoids submission to "a judge's subjective understandings as to what obstacles women can conceivably withstand in pursuit of" abortion and relies on the establishment framework that precisely measures a heartbeat. *See id*.

If the state were generally to ban abortions at some point early enough to encompass any child that *might* have a heartbeat (at five weeks, for example), that prohibition would sometimes prevent an abortion on a child not possessing one. Such an overbreadth would be a failure of narrow tailoring. Even if the state were to ban abortions at a later but still specific age, where *most* children would possess a heartbeat (perhaps seven weeks), there would be a better connection to the state's interest in a child with a heartbeat, but the bill could still prohibit abortions on the occasional child without one.

In the case at bar, the prohibition is not tied to an age at which a heartbeat is expected. Rather, it is tied to actual possession of an independent heartbeat by the actual child being considered for abortion. There is no broad sweep. The state's compelling interest is narrowly tailored to a measurable heartbeat.

3. Similar Narrow Tailoring is Reflected in Other Iowa Life/Death Statutes.

The Heartbeat Bill's narrowly tailored, medically precise measurement follows Iowa's statutory scheme, thus supporting the narrow tailoring of the statute in question. The Heartbeat Bill is narrowly tailored to be consistent with Iowa's determination of life and death as set out in the longstanding determination-of-death act, under which a dying person crosses the threshold from life to death when his or her heartbeat stops. Under the Heartbeat Bill, a person in the process of being born crosses the same threshold when his or her heartbeat begins.

In addition, just as the determination of death is made on the actual person in question, the determination of life is made on the baby in question, with an objective, bright-line standard.

Iowa's statute on determination of death uses medically precise measurements similar to the Heartbeat Bill to determine when life ceases:

> A person will be considered dead if … that person has experienced an irreversible cessation of *spontaneous respiratory and circulatory functions*. In the event that artificial means of support preclude a determination that these functions have ceased, a person will be considered dead … that person has experienced an irreversible *cessation of spontaneous brain functions*. Death will have occurred *at the time when the relevant functions ceased*.

ICA § 702.8 (emphasis added).

Consistent with this statute, by the time a child's heartbeat is detectable at around eight weeks, she very likely also has detectable brain functions (Affidavit David Franco, MD) and could not be considered dead under either measure set forth in this statute. If they can be, respiratory and circulatory functions are evaluated first, and a person must have lost both to satisfy the statute. As a person with spontaneous circulatory function, a child with a heartbeat could not be considered dead under this statute. An unborn child

with a heartbeat is thus a living person under Iowa law.

Where the definition of death is of critical importance throughout the Iowa Code, it is defined as the irreversible cessation of spontaneous respiratory *and* circulatory functions, or, where an alternative is necessary, the irreversible cessation of spontaneous brain functions. A definition of death necessarily constitutes a definition of life. An unborn child with a heartbeat is a living human being.

F. The Heartbeat Bill Does Not Ban Abortion

The Heartbeat Bill does not ban all or nearly all abortions. It simply requires those abortions to be performed during a multi-week period at the beginning of the pregnancy, rather than stretching out that period throughout the pregnancy.

The affidavit of Dr. Kathi Aultman lays out an important timeline. Around two weeks after the start of her last menstrual period, a woman ovulates and may become pregnant. Six to eight days after that (about three weeks after her last menstrual period), implantation occurs, and hCG appears in the maternal blood. This is important, because it is this substance in the blood or urine that makes the pregnancy detectable by laboratory or over-the-counter pregnancy tests. On the first day a pregnant woman misses her menstrual period about two weeks after ovulation, her chance of a positive pregnancy test at a clinic or with the more sensitive over-the-counter tests is about 98%. The hCG in her blood also increases rapidly, so that if she does not test positive on that first day, she will within the following few days.

From the time implantation occurs -- approximately three weeks after her last menstrual period -- until the baby's heartbeat is detected – approximately 7-9 weeks after her last

menstrual period – every pregnant woman in Iowa has the right to an abortion. There is significant opportunity to obtain an abortion before the detectable heartbeat would prohibit it.

For the forgoing reasons, summary judgment should be denied.

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